On July 21, 2022 a cash liquidating distribution of $1.43 per share to holders of common stock was announced. On July 29, 2022 the distribution was paid. This distribution is a part of a series of distributions in complete liquidation of Altaba, Inc. On April 2, 2019, the Fund’s Board of Directors approved the liquidation and dissolution of the Fund pursuant to a Plan of Complete Liquidation and Dissolution, which was approved by stockholders on June 27, 2019.

See Statement 1

See Statement 1
Part II  Organizational Action (continued)

17  List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶

Internal Revenue Code Sections 331 and 346

18  Can any resulting loss be recognized? ▶ No. See Statement 1

19  Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ This organizational action is reportable with respect to the tax year of the shareholder during which the distribution was received (e.g., 2022 for calendar year taxpayers).

Sign Here

ALEXI WELLMAN

CHIEF EXECUTIVE/FINANCIAL OFFICER

JEFF SOKOL

DELOITTE TAX LLP

225 WEST SANTA CLARA STREET, SUITE 200, SAN JOSE, CA 95113

Print/Type preparer’s name

Preparer’s signature

Date

Check if self-employed

Firm’s name

Firm’s address

Firm’s EIN

Phone no.

PTIN

Check         if

7/27/22

7/29/22

7/29/22

7/29/22

7/29/22

ALEXI WELLMAN

7/29/22
In general, the liquidating distribution will be treated for U.S. federal income tax purposes as part of a series of distributions in complete liquidation of Altaba Inc. (“Altaba”) in which amounts received by stockholders are treated as full payment in exchange for their shares of Altaba common stock. The liquidating distribution will first be applied against and reduce a stockholder’s adjusted tax basis in its Altaba common stock. A stockholder will recognize gain as a result of the liquidating distribution to the extent that the value of the liquidating distribution ($1.43 per share) received by the stockholder with respect to a share exceeds the stockholder’s adjusted basis in the share. A stockholder generally cannot recognize a loss on a liquidating distribution until the final liquidating distribution is made. If a stockholder holds different blocks of Altaba common stock (generally as a result of having acquired shares at different times or at different prices), gain or loss is calculated separately with respect to each such block.